1	DANIEL G. BOGDEN United States Attorney	
2	MARGARET M. STANISH Assistant United States Attorney	
3	333 Las Vegas Blvd., South, Suite 5000	
4	Las Vegas, Nevada 89101 (702) 388-6336	
5	IINITED STATES	DISTRICT COURT
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7	DISTRICT OF NEVADA -000-	
8		
9	UNITED STATES OF AMERICA,	) CRIMINAL INFORMATION
10	PLAINTIFF,	) CR-S-05-0413-PMP (GWF)
11	VS.	) ) VIOLATIONS:
12	HEATHER CATHERINE TALLCHIEF,	) ) Bank Embezzlement – 18 U.S.C. § 656
13	DEFENDANT.	
14 15		Possession of Fraudulently Obtained Passport – 18 U.S.C. § 1546
16		Forfeiture – 18 U.S.C. § 982(a)(2)(A); 21 U.S.C. § 853(p)
17 18	THE UNITED STATES ATTORNEY'S OFFICE, DISTRICT OF NEVADA CHARGES:	
19	COUNT ONE	
20	Bank En	nbezzlement
21	On or about October 1, 1993, in	the State and Federal District of Nevada,
22	HEATHER CATH	ERINE TALLCHIEF
23	the defendant herein, being an armored service security guard and driver connected with Bank of	
24	America, a financial institution insured by the Fe	ederal Insurance Deposit Corporation, with intent to
25	injure and defraud, did embezzle approximately	\$2,395,040 in United States Currency of the Bank of

all in violation of Title 18, United States Code, Section 656.

America,

# COUNT TWO Credit Union Embezzlement

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On or about October 1, 1993, in the State and Federal District of Nevada,

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#### HEATHER CATHERINE TALLCHIEF

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the defendant herein, being an armored service security guard and driver connected with Nevada Federal Credit Union, a financial institution insured by the National Credit Union Share Insurance Fund, with intent to injure and defraud, did embezzle approximately \$509,363 in United States Currency of the Nevada Federal Credit Union,

all in violation of Title 18, United States Code, Section 657.

#### COUNT THREE

Possession of Fraudulently Obtained Passport

Between on or about September 12, 2005, to September 15, 2005, in the State and Federal District of Nevada and elsewhere,

### HEATHER CATHERINE TALLCHIEF,

the defendant herein, possessed a document prescribed by statute and regulation for entry into the United States, that is a United Kingdom passport, No. 025590621, in the name of Donna Marie Eaton, knowing the same to have been procured by false statement and fraud,

all in violation of Title 18, United States Code, Section 1546.

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## FORFEITURE ALLEGATION ONE Bank Embezzlement Proceeds

2	Bank Embezziement Poeceds	
3	1. The allegations of Count One of this Criminal Information are hereby realleged	
4	and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions	
5	of Title 18, United States Code, Section 982(a)(2)(A).	
6	2. Upon a conviction of the felony offenses charged in Count One of this Criminal	
7	Information,	
8	HEATHER CATHERINE TALLCHIEF,	
9	the defendant herein, shall forfeit to the United States of America all property constituting, or derived	
10	from, proceeds obtained directly or indirectly, as the result of violations of Title 18, United States	
11	Code, Section 656, up to \$2,395,040 in United States Currency.	
12	3. If any property being subject to forfeiture pursuant to Title 18, United States	
13	Code, Section 982, as a result of any act or omission of the defendant	
14	a. cannot be located upon the exercise of due diligence;	
15	b. has been transferred or sold to, or deposited with, a third party;	
16	c. has been place beyond the jurisdiction of the court;	
17	d. has been substantially diminished in value, or;	
18	e. has been commingled with other property that cannot be divided	
19	without difficulty;	
20	it is the intent of the United States of America, pursuant to Title 18, United States Code, Section	
21	982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the	
22	defendant up to \$2,395,040 in United States Currency.	
23	All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and (b)(1).	
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#### Credit Union Embezzlement Proceeds 2 3 The allegations of Count Two of this Criminal Information are hereby realleged 1. 4 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions 5 of Title 18, United States Code, Section 982(a)(2)(A). Upon a conviction of the felony offenses charged in Count Two of this 2. 6 7 Criminal Information, 8 HEATHER CATHERINE TALLCHIEF, 9 the defendant herein, shall forfeit to the United States of America all property constituting, or derived 10 from, proceeds obtained directly or indirectly, as the result of violations of Title 18, United States 11 Code, Section 657, up to \$509,363 in United States Currency. 12 If any property being subject to forfeiture pursuant to Title 18, United States 3. 13 Code, Section 982, as a result of any act or omission of the defendant --14 cannot be located upon the exercise of due diligence; a. 15 has been transferred or sold to, or deposited with, a third party; b. 16 has been place beyond the jurisdiction of the court; c. 17 d. has been substantially diminished in value, or; 18 has been commingled with other property that cannot be divided e. 19 without difficulty; 20 it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 21 / / / 22 111 23 24 111 25 1 1 1

FORFEITURE ALLEGATION TWO

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1	982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the
2	defendant up to \$509,363 in United States Currency.
3	All pursuant to Title 18, United States Code, Sections 982(a)(2)(A) and (b)(1).
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5	DATED: this 3/5day of October 2005.
6	
7	DANIEL G. BOGDEN
8	United States Attorney
9	Margarally Maris
10	MARGARET M. STANISH
11	Assistant United States Attorney
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